

STATE OF SOUTH CAROLINA)
)
COUNTY OF SUMTER) IN THE COURT OF COMMON PLEAS
THIRD JUDICIAL CIRCUIT
C.A. FILE NO.: 2023-CP-43-____

PATRICK STAUFFER,)
Plaintiff(s),)
)
)
)
vs.)
)
ANDREW BROWN,)
)
Defendant(s).)

SUMMONS
Jury Trial Demanded

TO: THE DEFENDANT ABOVE NAMED:

YOU ARE SUMMONED AND REQUIRED to answer the Complaint in this action of which a copy is herewith served upon you, and to serve a copy of your answer on the subscribed at his office, Post Office Box 11785, 546 E. Main Street, Rock Hill, South Carolina 29731, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the prescribed time, a judgment by default may be entered against you for the amount or other remedy requested in the attached Complaint.

s/D. Bradley Jordan #15288
Jordan Law Firm, PC
546 East Main Street
Post Office Box 11785
Rock Hill, SC 29731
(Tel.) 803-817-7999
(Fax) 803-817-9704
bradjordan@comporium.net
ATTORNEYS FOR PLAINTIFF

December 15, 2023

Rock Hill, South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	THIRD JUDICIAL CIRCUIT
COUNTY OF SUMTER)	C.A. FILE NO.: 2023-CP-43-____

PATRICK STAUFFER,)	
Plaintiff(s),)	COMPLAINT
)	**Jury Trial Demanded**
)	
vs.)	
)	
ANDREW BROWN,)	
)	
Defendant(s).)	

TO: THE DEFENDANT ABOVE NAMED:

The Plaintiff above named, complaining of the Defendant herein, would respectfully show unto this Honorable Court as follows:

1. Plaintiff, Patrick Stauffer, is a citizen and resident of Richland County, South Carolina. At all times hereinafter mentioned the Plaintiff was an officer, Lieutenant Colonel in the United States Army working at the Shaw Air Force Base, Sumter, South Carolina.
2. The Defendant, Andrew Brown, upon information and belief, is a citizen and resident of the County of Sumter, State of South Carolian and was at all times hereinafter mentioned, a Colonel in the United States Army working at the Shaw Air Force Base, Sumter, South Carolina. Col. Brown was Stauffer's senior commanding officer.
3. This Court has jurisdiction over the subject matter of this action and venue is proper in Sumter County, South Carolina as the events giving rise to this Complaint occurred at Shaw Air Force Base, Sumter, Sumter County, South Carolina.
4. On or about March 1, 2023, at Shaw Air Force Base, Sumter, Sumter County, South Carolina, Andrew Brown intentionally engaged in harmful and offensive conduct

directed at Patrick Stauffer. Brown struck Patrick Stauffer, yelled at him and then physical attacked him, beating about his head and body, causing injury to his head and shoulder.

5. Plaintiff suffered physical and emotional injuries having to seek treatment and counseling.

**FOR A FIRST CAUSE OF ACTION
(Civil Assault and Battery)**

6. The Plaintiff incorporates the allegations of paragraphs 1 through 5 as if set forth hereinafter verbatim.

7. The Defendant did place Plaintiff in reasonable fear of bodily harm. The Defendant did unlawfully touch, strike and physically abuse Plaintiff. The contact with Plaintiff was unlawful, unauthorized and offensive. Plaintiff never consented to the unlawful contact by Defendant.

8. Andrew Brown knowingly and intentional made harmful and offensive physical contact with Patrick Stauffer, causing physical injury and emotional damages, thereby committing the tort of civil assault and battery.

9. As a direct and proximate result of the intentional assault and battery of Plaintiff by Defendant, the Plaintiff has suffered injury and harm as follows:

- a) Plaintiff has incurred or will incur medical expenses, both past, present and future;
- b) Plaintiff may have lost of income and/or lost inability to work for a period of time;
- c) Plaintiff has endured and will endure, pain and suffering;
- d) Plaintiff has loss of enjoyment of life including inability to sleep and inability to focus on work or enjoy his hobbies and recreation;
- e) Plaintiff has suffered temporary and permanent physical and emotional injuries;

- f) Plaintiff has suffered and will suffer in the future, mental anguish, emotional distress and anxiety including panic attacks;
- g) In other ways as a Judge or Jury may determine;
- 10. The Plaintiff is entitled to actual damages and punitive damages as may be awarded.

**FOR A SECOND CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)**

11. The Plaintiff incorporates the allegations of paragraphs 1 through 10 as if set forth hereinafter verbatim.

12. The Defendant did place Plaintiff in reasonable fear of bodily harm. The Defendant did unlawfully touch, strike and physically abuse Plaintiff. The contact with Plaintiff was unlawful, unauthorized and offensive. Plaintiff never consented to the unlawful contact by Defendant.

13. The Defendant intentionally inflicted severe emotional distress on Plaintiff. The Defendant's actions were extreme and outrageous and exceeded all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized community.

14. Andrew Brown engaged in extreme and outrageous conduct that went beyond the bounds of decency and caused Patrick Stauffer severe emotional distress, thereby committing the tort of intentional infliction of emotional distress.

15. As a direct and proximate result of the Defendant's extreme and outrageous intentional acts, and intentional infliction of emotional distress, the Plaintiff has suffered injury and harm as follows:

- a) Plaintiff has incurred or will incur medical expenses, both past, present and future;

- b) Plaintiff may have lost of income and/or lost inability to work for a period of time;
 - c) Plaintiff has endured and will endure, pain and suffering;
 - d) Plaintiff has loss of enjoyment of life and loss of ability to sleep and focus on work or enjoy his hobbies or recreation;
 - e) Plaintiff has suffered temporary and permanent physical and emotional injuries;
 - f) Plaintiff has suffered and will suffer in the future, mental anguish, emotional distress and anxiety including panic attacks and the emotional distress suffered by Plaintiff was so severe that no reasonable person could be expected to endure it.
 - g) In other ways as a Judge or Jury may determine;
16. The Plaintiff is entitled to actual damages and punitive damages as may be awarded.

**FOR A THIRD CAUSE OF ACTION
(Restraining Order/ Injunction)**

17. The Plaintiff incorporates the allegations of paragraphs 1 through 16 as if set forth hereinafter verbatim.

18. The Defendant did place Plaintiff in reasonable fear of bodily harm. The Defendant did unlawfully touch, strike and physically abuse Plaintiff. The contact with Plaintiff was unlawful, unauthorized and offensive. Plaintiff never consented to the unlawful contact by Defendant and Defendant's actions were in violation of the criminal laws of the State of South Carolina.

19. The Plaintiff believes he is entitled to a restraining order enjoining the Defendant from coming about, contacting, bothering or beating Plaintiff or having any contact with Plaintiff in any manner whatsoever.

WHEREFORE, your Plaintiff prays for judgment against Defendant and specifically the following relief:

- a. Compensatory damages for the physical injuries and emotional distress suffered as a result of the Defendant's actions;
- b. Punitive damages to deter the Defendant from engaging in similar conduct;
- c. Injunctions and restraining orders as deemed necessary to protect the Plaintiff from further harm;
- d. Costs and attorney's fees incurred in pursuing this legal action.
- e. For such other and further relief as the Court may deem just and proper.

s/D. Bradley Jordan #15288
Jordan Law Firm, PC
546 East Main Street
Post Office Box 11785
Rock Hill, SC 29731
(Tel.) 803-817-7999
(Fax) 803-817-9704
bradjordan@comporium.net
ATTORNEYS FOR PLAINTIFF

December 15, 2023

Rock Hill, South Carolina